

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

KAREN BACKUES KEIL, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:18-cv-06074-BP
)	<i>This motion also pertains to:</i>
)	<i>Betz v. Bearden, No. 18-6079</i>
)	<i>Zieser v. Bearden, No. 18-6103</i>
)	<i>Doe v. Bearden, No. 19-cv-6161</i>
EDWARD BEARDEN, et al.,)	
)	
Defendants.)	

AMENDED REQUEST FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM

Plaintiffs in the matters above, consolidated for trial, respectfully petition this Court to issue a Motion for a Writ of Habeas Corpus Ad Testificandum for Teri L. Dean, DOC ID 1153665.

In support of this Petition, Plaintiffs state as follows:

1. This Court has the authority and discretion to issue a writ of habeas corpus ad testificandum where an inmate-witness's testimony is relevant and necessary to the pending action. 28 U.S.C. §§ 1651(a) and 2241(c)(5).

2. Teri Dean, DOC ID 1153665, is currently confined in the Missouri Department of Corrections at Women's Eastern Reception, Diagnostic and Correction Center, 1101 East Highway 54, Vandalia, MO 63382.

3. The presence of Teri Dean is necessary to give testimony in this lawsuit.

4. This is an action pursuant to 42 U.S.C. § 1983, in which the Plaintiffs seek compensatory damages and punitive damages against Defendant(s) for violations of their constitutional rights while acting under color of state law, together with reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988.

5. In summary, Plaintiffs' allegations against Defendant(s) are that the Defendant Corrections Officer(s) harassed, abused, and sexually assaulted all Plaintiffs during their confinement at the Chillicothe Correctional Center in Missouri, roughly between June 2011 and October 2018. Ms. Dean's allegations against at last one same Defendant are consistent with and establish proof of the claims of the Plaintiffs in the instant consolidated case pursuant to FRE 415.

6. Ms. Dean's testimony is, therefore, relevant and necessary to this lawsuit.

WHEREFORE, Plaintiffs respectfully request that the Clerk of the Court be directed to issue a certified Writ of Habeas Corpus Ad Testificandum commanding the Missouri Department of Corrections at Women's Eastern Reception, Diagnostic and Correction Center, Andela Mesmer, to produce Teri Dean, Inmate ID 1153665, in the United States District Courthouse in Kansas City, Missouri, on January 31, 2022, and continuing for such time as necessary.

Respectfully submitted,

/s/ Jenifer C. Snow

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Writ of Habeas Corpus Ad Testificandum has been served upon Counsel of Record by means of the electronic filing system this 13th day of December 2021.

/s/ Jenifer C. Snow _____